

SLR guidance

Uri Driscoll [REDACTED]

[Actions](#)

To:

[CoastalSLRGuidanceDocument](#)

Monday, February 10, 2014 3:13 PM

You replied on 2/12/2014 12:54 PM.

To whom it may concern

Please consider that our agriculture lands particularly in Humboldt County offer a significant and extremely valuable commodity for both our region and the neighboring regions that benefit from our grass raised and organic beef, dairy and other agriculture products. Grazing areas close to the coastal zone are utilized in a way that enhances wildlife habitat and produce revenue. These lands should be protected by maintaining and adding structure to existing levees. The permitting process for maintaining these levees and drainage ditches needs to be made much simpler and less costly for land owners and managers. Currently unnecessary restrictions and costs prohibit much needed repairs.

Additionally many of these levees can be secured using the living shoreline concept suggested in the Draft document. The ability to utilize the most effective vegetation should not be limited to plants that are considered native.

Coastal dunes have been eroding at a rapid rate since ammophila removal programs were initiated in the 1990's. The permitting of these projects by the Coastal Commission has contributed to that increased erosion rate. While not considered native the ammophila has given us the benefit of increased accretion and dune topography. It has also significantly benefited coastal wetlands that add biodiversity, stabile access and coastal protection.

The ongoing removal of this beneficial vegetation is also in direct conflict with the living shoreline concept that this draft promotes.

Bayshore habitats in Humboldt Bay also have seen the benefit of a plant considered non native spartina densiflora. This plant has been known to increase shore line height in some cases by 2 to 3 feet. The expensive removal projects are also counter to the living shoreline concepts promoted in the draft plan. This plant will and has proved valuable in decreasing storm erosion and wave fetch effects considerably better than the seasonally dormant native plants. It should also be noted that although not as apparent due to a shorter profile thriving populations of native plants do exist within the spartina colonies much like is seen within the ammophila dunes.

If we are to plan for sea level rise we need to be able to protect our valuable agriculture producing lands by enabling farmers and ranchers easy permitting processes for securing existing levees and dikes. We need to be able to utilize the most effective vegetation available to develop living shoreline habitats regardless of a plants native or non native status.

Sincerely
Uri Driscoll
[REDACTED]